

1800 M Street, NW Suite 800-North Washington, DC 20036 Sender's Direct Line: 202.365.0325

KB@KarenBrinkmann.com

December 5, 2018

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: Connect America Fund, WC Docket No. 10-90;

Connect America Phase II Challenge Process, WC Docket No. 14-93 –

Alaska Communications CAF II-Qualifying Locations

Dear Ms. Dortch:

On behalf of Alaska Communications Systems Group, Inc. ("Alaska Communications"), enclosed is a list of 15 census blocks in Alaska Communications' price cap local exchange service territory which meet the definition of high-cost or extremely high-cost, and are "unserved" by an unsubsidized competitor with broadband at speeds of at least 10 Mbps downstream and 1 Mbps upstream. Therefore, they qualify for high-cost support under the Commission's Connect America Fund ("CAF") Phase II parameters for Alaska Communications. These census blocks were reported in December 2016 FCC Form 477 filings as "served" by GCI within the meaning of the CAF rules. More recently, however, GCI has filed information with the Commission confirming that these census blocks, in fact, are unserved. Therefore, they are eligible for CAF Phase II support.

Please direct any questions concerning this matter to me.

Respectfully submitted,

Karen Brinkmann

Counsel to Alaska Communications

Attachment: Excel Spreadsheet

cc: Alex Minard Talmage Cox

Dangkhoa Nguyen

Connect America Fund, WC Docket No. 10-90, Order, 31 FCC Rcd 12086 (2016).

Reply of GCI Communication Corp., WC Docket Nos. 10-90 & 14-93 (filed May 23, 2018) at 11-12.